

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff,

v.

HO WAN KWOK,

Defendant.

Case No. 1:23-CR-118-1 (AT)

**DECLARATION OF
SIDHARDHA KAMARAJU, ESQ.
ACCOMPANYING DEFENDANT'S
MOTION TO DISMISS THE
SUPERSEDING INDICTMENT**

I, SIDHARDHA KAMARAJU, ESQ., hereby declare, pursuant to 28 U.S.C. § 1746, as follows:

1. I am a partner at the law firm Pryor Cashman LLP, counsel for Defendant Ho Wan Kwok in the above-captioned matter. I submit this declaration upon my personal knowledge in support of Defendant's Motion to Dismiss the Superseding Indictment.


2. A true and correct copy of the GTV Confidential Information Memorandum dated April 20, 2020, which was produced in this proceeding by the government, is attached hereto as **Exhibit A**.

3. A true and correct copy of a June 26, 2023 letter from the government to prior counsel for Mr. Kwok disclosing information pursuant to its obligations under *Brady v. Maryland*, 373 U.S. 83 (1963), is attached hereto as **Exhibit B**.

4. A true and correct copy of a G|CLUBS Membership Agreement, which was produced in this proceeding by the government, is attached hereto as **Exhibit C**.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 14, 2023.



Sidhardha Kamaraju
*Counsel for Defendant
Ho Wan Kwok*